

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TECNOMATIC, S.p.A.,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:11-cv-01652
)	
REMY, INC.,)	Honorable Edmond E. Chang
HANSON SYSTEMS, LLC,)	
D/B/A EAGLE TECHNOLOGIES GROUP,)	
ODAWARA AUTOMATION, INC.,)	
REMY INTERNATIONAL, INC.,)	
DELCO REMY MEXICO, S.R.L. de C.V.,)	
REMY COMPONENTES S. de R.L. de C.V.,)	
and DOES 1-10,)	
)	
Defendants.)	

**DEFENDANT HANSON SYSTEMS, LLC,
D/B/A EAGLE TECHNOLOGIES GROUP'S
MOTION TO DISMISS**

Pursuant to Rule 12(b) of the Federal Rules of Civil Procedure, Defendant Hanson Systems, LLC, d/b/a Eagle Technologies Group ("Eagle"), moves to dismiss the Complaint filed by Plaintiff Tecnomatic, S.p.A. ("Tecnomatic"), for the following reasons:

1. Tecnmatic's Complaint should be dismissed under Federal Rule 12(b)(2) for lack of personal jurisdiction.
2. The Complaint should be dismissed under Federal Rule 12(b)(3) because Tecnomatic filed this action in an improper venue.
3. The trade-secrets claim (Count VI) against Eagle is barred by the statute of limitations and should be dismissed under Federal Rule 12(b)(6).

4. The claims against Eagle for tortious interference with contract (Count XIII) and tortious interference with business relations (Count XIV) are barred by the statute of limitations and should be dismissed under Federal Rule 12(b)(6).

5. The unjust-enrichment claim (Count XV) is preempted by the Uniform Trade Secrets Act and is duplicative of the trade-secrets claim; therefore, it should be dismissed under Federal Rule 12(b)(6).

In support of this motion to dismiss, Eagle is contemporaneously filing a brief in support and accompanying affidavit, which Eagle incorporates by reference.

For these reasons, Eagle respectfully requests that the Court grant the motion to dismiss and award Eagle all other just and proper relief.

Respectfully submitted:

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LLC, d/b/a Eagle Technologies Group***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document, “Defendant Hanson Systems, LLC, d/b/a Eagle Technologies Group’s Motion to Dismiss,” was electronically filed on May 20, 2011, with the Clerk of the Court using CM/ECF system, which sent electronic notification of such filing to the following counsel of record:

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